

Exhibit E

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#
DATE FILED: 12/10/12

----- X
MONIQUE DA SILVA MOORE, et al., :

Plaintiffs, :

11 Civ. 1279 (ALC) (AJP)

-against- :

ORDER

PUBLICIS GROUPE & MSL GROUP, :

Defendants. :

----- X
ANDREW J. PECK, United States Magistrate Judge:

Plaintiffs should provide defendants, and the Court, by December 13, 2012, with the proposed document requests for class certification discovery, corresponding to the Exhibit A categories in plaintiffs' December 7, 2012 letter. (Defendants also may want to try their hand at discovery requests that they believe correspond to those parts of plaintiffs' Exhibit A that defendants agree are ripe for class discovery.) The Court notes that it appears that "policy" documents are appropriate, but "implementation" documents, i.e., re specific individuals, do not appear appropriate.

The Court will address this issue at the December 14, 2012 conference. The parties need not bring their ESI/predictive coding consultants to the conference.

SO ORDERED.

Dated: New York, New York
December 10, 2012



Andrew J. Peck
United States Magistrate Judge

Copies **by ECF** to: All Counsel
Judge Andrew L. Carter, Jr.